Five-Year Review Report

for

Northern Engraving Corporation

Sparta, Wisconsin

August, 2005

PREPARED BY:

Wisconsin DNR for
U.S. EPA Region 5

Approved by:

Richard C. Karl, Director
Superfund Division

Date:

9/2/05

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Figure 1 – Site Location and Layout

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List of Acronyms

ACL	Alternative Concentration Limit
ARAR	Applicable or Relevant and Appropriate Requirement
CD	Consent Decree
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EPA	United States Environmental Protection Agency
CFR	Code of Federal Regulations
MCL	Maximum Contaminant Level
MCLG	Maximum Contaminant Level Goal
NEC	Northern Engraving Corporation Superfund Site
NCP	National Contingency Plan
NPL	National Priorities List
O&M	Operation and Maintenance
PRP or RP	Potentially Responsible Party
RA	Remedial Action
RD	Remedial Design
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
SDWA	Safe Drinking Water Act
VOC	Volatile Organic Compound
WDNR	Wisconsin Department of Natural Resources

Executive Summary

The remedy for the Northern Engraving Superfund site included excavation, consolidation, stabilization and capping of contaminated soils and sludges on site, institutional controls, and monitoring of contaminated groundwater. Groundwater remedial goals were subsequently met and groundwater monitoring discontinued in 2000. The site was deleted from the NPL in 1997.

The assessment of this five-year review found that the remedy is functioning as designed. The remedy is protective of human health and the environment. All threats at the site have been addressed through stabilization and capping of contaminated soil and sludges, the installation of fencing and the implementation of an institutional control.

The following recommendations are made to improve the protectiveness of the remedy:

- It was noted that the fence inspection was not listed as an item on the inspection log and it is recommend that it be added to the log in the future.

- The current deed affidavit may not be as effective as a deed restriction. Therefore, it is recommended that a more effective control, in the form of a deed restriction, be filed. This instrument outlines what activities, such as cap disturbance and excavation or excavation in the seepage pit area, are prohibited. WDNR has guidance on the preparation of deed restrictions that may be followed in the document "Case Close Out and the requirements for Institutional controls and VPLE Insurance", PUBL-RR-606 http://dnr.wi.gov/org/aw/rr/archives/pubs/RR606.pdf). WDNR and EPA will work with the PRP to implement this recommendation within six months.

Five-Year Review Summary Form

SITE IDENTIFICATION		
Site name *(from WasteLAN)*: Northern Engraving Corporation Superfund Site		
EPA ID *(from WasteLAN)*: WID006183826		
Region: 5	**State:** WI	**City/County:** Sparta/Monroe

SITE STATUS	
NPL status: ☐ Final ☒ Deleted ☐ Other (specify)	
Remediation status (choose all that apply): ☐ Under Construction ☐ Operating ☒ Complete	
Multiple OUs?* ☐ YES ☒ NO	**Construction completion date:** 9 / 29 / 1989
Has site been put into reuse? ☐ YES ☒ NO	

REVIEW STATUS	
Lead agency: ☒ EPA ☐ State ☐ Tribe ☐ Other Federal Agency	
Author name: Gary A. Edelstein, P.E.	
Author title: Remedial Engineer	**Author affiliation:** Wisconsin DNR, completed for U.S. EPA under a CA
Review period:** 2 / 1 / 2005 to 6 / 30 / 2005	
Date(s) of site inspection: 4 / 11 / 2005	
Type of review: ☒ Post-SARA ☐ Pre-SARA ☐ NPL-Removal only ☐ Non-NPL Remedial Action Site ☐ NPL State/Tribe-lead ☐ Regional Discretion)	
Review number: ☐ 1 (first) ☒ 2 (second) ☐ 3 (third) ☐ Other (specify)	
Triggering action: ☐ Actual RA On-site Construction at OU #___ ☐ Construction Completion ☐ Other (specify)	☐ Actual RA Start at OU# NA ☒ Previous Five-Year Review Report
Triggering action date *(from WasteLAN)*: 9 / 12 / 2000	
Due date *(five years after triggering action date)*: 9 / 12 / 2005	

* ["OU" refers to operable unit.]
** [Review period should correspond to the actual start and end dates of the Five-Year Review in WasteLAN.]

Five-Year Review Summary Form, cont'd.

Issues:

A somewhat minor issue is the exclusion of fence inspection information from the on-site maintained inspection logs.

The deed affidavit may not be as effective as a deed restriction.

Recommendations and Follow-up Actions:

It is recommended that the fence inspection information be added to the inspection logs.

It is recommended that a deed restriction be filed for the site.

Protectiveness Statement(s):

The remedy continues to be protective of human health and the environment.

I. Introduction

The purpose of the five-year review is to determine whether the remedy at a site is protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in Five-Year Review reports. In addition, Five-Year Review reports identify issues found during the review, if any, and identify recommendations to address them.

The Agency is preparing this Five-Year Review report pursuant to CERCLA §121 and the National Contingency Plan (NCP). CERCLA §121 states:

> *If the President selects a remedial action that results in any hazardous substances, pollutants, or contaminants remaining at the site, the President shall review such remedial action no less often than each five years after the initiation of such remedial action to assure that human health and the environment are being protected by the remedial action being implemented. In addition, if upon such review it is the judgment of the President that action is appropriate at such site in accordance with section [104] or [106], the President shall take or require such action. The President shall report to the Congress a list of facilities for which such review is required, the results of all such reviews, and any actions taken as a result of such reviews.*

The Agency interpreted this requirement further in the NCP; 40 CFR §300.430(f)(4)(ii) states:

> *If a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years after the initiation of the selected remedial action.*

The Wisconsin DNR conducted the five-year review of the remedy implemented at the Northern Engraving Corporation Superfund Site (NEC) in Sparta, Wisconsin for the United States Environmental Protection Agency (EPA), Region 5. This report documents the results of the review.

The triggering action for this statutory review is the completion of the last review on September 12, 2000. A five-year review wasn't completed in 1995, but one was completed in 2000, so this is the second five-year review for the site. The five-year review is required due to the fact that hazardous substances, pollutants, or contaminants remain at the site above levels that allow for unlimited use and unrestricted exposure.

II. Site Chronology

Table 1 - Chronology of Site Events

Event	Date
Lagoon and seepage pit management of wastes	1968 - 1976
Above ground treatment system installed	1976
Final listing on EPA National Priorities List	9/1984
Administrative order for responsible party performance of RI/FS and remedy completed	9/10/85
Remedial Investigation/Feasibility Study (RI/FS) completed by RP released to public for comment	8/27/87
ROD selecting the remedy is signed	9/28/87
Start of on-site construction for selected remedy	6/6/88
Completion of closeout report for on-site construction for selected remedy	9/29/89
Deletion from NPL	10/29/1997
Groundwater monitoring discontinued	11/2000
First Five-Year Review by EPA	9/12/00

III. Background

Physical Characteristics

The NEC site is located in Sparta, Wisconsin, at 803 South Black River Street (Figure 1). Sparta is a rural community with a population of 6,800 approximately 25 miles east of La Crosse. The NEC facility is adjacent to residential and business areas and abuts the La Crosse River which forms the southern boundary of the site. Domestic water is supplied to most residences in the city through a public distribution system. Production wells for this system are about 3/4 mile from the site and draw water from a bedrock aquifer at depths from 105 to 260 feet. The closest private well is located approximately 1/4 mile from the NEC facility. Private wells are completed in the bedrock aquifer.

The site is presently the location of NEC manufacturing activities. NEC produces metal name plates, dials, and decorative trim for the automotive industry utilizing anodizing, chemical etching, and chromate conversion coating processes. The site was placed on the National Priorities List September 21, 1984 (Federal Register number 185, volume 49 and page numbers 37070-37090) because of the potential for soil, groundwater, and surface water contamination due to past waste water treatment and disposal practices employed at the site.

History of Contamination

Four areas on the NEC facility were identified as potential sources of contamination. These areas include a sludge lagoon, a seepage pit, a sludge dump site, and a lagoon drainage ditch. From 1968 to 1976 rinse waters from the plant, after treatment with sodium hydroxide were discharged to the lagoon where metal hydroxide solids were allowed to settle before discharge of the effluent via the drainage ditch to a storm run off ditch where it combined with the City of Sparta's wastewater effluent prior to discharge into the La Crosse River. Accumulated sludge in the lagoon was on two occasions excavated and disposed of on-site at what is referred to as the sludge dump. The seepage pit was used to neutralize spent acid waste by reaction with limestone.

A waste water treatment system was installed in 1976 which uses above ground steel settling tanks. Waste previously treated in the settling lagoon and in the seepage pit were combined and routed to the treatment system. The lagoon was used for emergency storage of untreated waste water until 1980 when a lined emergency holding lagoon was put into service. In 1981 the seepage pit was filled, graded, and revegetated.

Field investigation tasks described in the March 1985, Remedial Investigation/Feasibility Study (RI/FS) Work Plan (W/P) identified areas within the NEC facility where hazardous constituents posed a potential threat to public health, welfare, and the environment. This W/P was developed under an Administrative Consent Order signed September 10, 1985 in which NEC agreed to perform the RI/FS and to implement the recommended remedy for the site.

Analysis of on-site groundwater showed elevated levels of copper, fluoride, nickel, zinc, 1,1-dichloroethylene, trichloroethylene, and vinyl chloride. Data indicated that the contaminants moved with the groundwater toward the La Crosse River where the groundwater discharges to the river at the southern boundary of the site. Highest levels of these indicator parameters were detected down gradient from and adjacent to the sludge lagoon and the seepage pit. Organic chemicals were typically below 100 parts per billion (ppb) except for trichloroethylene which was detected at levels as high as 670 ppb.

Surface soils were not contaminated except in the immediate vicinity of the drainage ditch. Soil samples collected below the sludge lagoon, sludge dump site, and seepage pit showed elevated levels of one or more of the above mentioned inorganic indicator parameters. In addition, both the sludge lagoon and the sludge dump site contained quantities of metal hydroxide sludge. The May 1986, Remedial Investigation (RI) Report may be consulted for a complete summary of the results of the site study.

IV. Remedial Actions

Remedy Selection

The August 1987, Feasibility Study (FS), released for public comment August 27, 1987, developed and evaluated an array of remedial alternatives for each discrete waste unit on site. The FS identified remedial alternatives which provide minimization of long-term contact with contaminated soil and sludge, and prevent ingestion of contaminated groundwater.

On September 28, 1987, the Regional Administrator approved a Record of Decision (ROD) which selected the following remedial action at each of the designated areas on the NEC facility.

Source Control

1. Sludge Lagoon: contaminated sludges and soils in the sludge lagoon to be solidified, and a RCRA cover installed atop the lagoon to minimize leaching of contaminants into groundwater and reduce health risks related to direct contact with the sludges and soils.

2. Drainage Ditch: contaminated soil in the drainage ditch to be excavated and solidified in the sludge lagoon to minimize health risks associated with direct contact with the soil.

3. Seepage Pit: The PRPs will develop and implement deed restrictions at the seepage pit to minimize the potential of direct contact with contaminated soils. Long-term groundwater monitoring will be instituted to track changes in groundwater quality relative to RCRA groundwater protection standards.

4. Sludge Dump Site: Contaminated sludges and soils in the sludge dump site will be excavated and solidified in the sludge lagoon effectively minimizing the migration of contaminants into the groundwater and any risks associated with direct contact with the sludges and soil.

The ROD performance standard for the excavation of sludges and soil at the sludge dump site and excavation of soil at the drainage ditch was background or method detection limits for the indicator compounds for the remedial action to meet the RCRA clean closure requirements.

Management of Migration

Site groundwater monitoring and surface water protection are managed through use of alternate concentration limits (ACLs) as groundwater performance standards. The use of ACLs at the NEC site meet the intent of RCRA groundwater requirements and the criteria established in SARA. There are known and projected points of entry of contaminated groundwater into surface water. The ACLs were determined to be:

Fluoride:	14,800 µg/l
Copper:	1,000 µg/l
Nickel:	644 µg/l
Zinc:	5,000 µg/l
Trichloroethylene:	40 µg/l
Vinyl Chloride:	10 µg/l

1, 1-Dichloroethylene: 10 μg/l

The concentrations for the indicator contaminants remained below the ACLs during the second five year monitoring period indicating that the remedy implemented at the NEC site remains protective of human health and the environment.

Remedy Implementation

Excavation of the combined soil and sludge at the dump site started June 6, 1988. Visual observation for the presence of sludge and impacted soil was used to define the initial limits of the excavation. The Remedial Design called for the excavation of approximately 900 cubic yards of material. Cleanup levels were not reached in all areas of the excavated sludge dump site following the initial excavation. Performance sampling showed that cleanup standards were exceeded along the east and north side walls and on the bottom of the excavation. Excavation of an additional 400 to 500 cubic yards of soil from these areas was required. The practical lateral limit of the additional excavation was defined by the foundations of currently existing structures which were threatened by the excavation. Copper and nickel levels in this area adjacent to the on-site structures still exceeded the proposed cleanup levels. All soil removed from the sludge dump site was moved to the sludge lagoon for stabilization. The excavated area was backfilled with native soil to the original grade and vegetative cover was provided.

The remedial action at the drainage ditch required excavating the area of the ditch to a depth of two to three feet and stabilization of the excavated material in the sludge lagoon. During the initial excavation approximately 50 feet of ditch was excavated between the sludge lagoon and the storm runoff ditch. Two to three feet of soil was removed as determined by the depth to the groundwater. The width established during the excavation ranged from 10 feet adjacent to the sludge lagoon to about four feet at the confluence with the storm runoff ditch. About 25 cubic yards of soil were removed.

Post-excavation sampling results showed that the indicator parameters in the drainage ditch side wall samples exceed the proposed cleanup levels. Excavation of an additional 25 cubic yards extended the area to a width ranging from 18 to 20 feet for the entire length of the drainage ditch. Although significant reductions in the level of contamination were observed, concentrations still exceeded the target levels. In response, an additional 18 cubic yards of soil were excavated from the area which showed the highest concentrations. A total of 68 cubic yards of soil were excavated from the drainage ditch area.

Cumulative hazard indexes have been calculated to define the risk due to exposure through ingestion of soil contaminated at these residual concentration levels. Cumulative indexes determined using appropriate data are below the maximum criteria and are considered protective of human health.

Future land development restrictions will be developed within six months of this Report for the seepage pit area. A new affidavit (Attachment 1) shall be filed with the Monroe County Register of Deeds office indicating the location of the seepage pit area and calling to attention that waste disposal activities have taken place at this location and giving all activities of what the seepage pit area shall be use for.

Sludge Lagoon stabilization was achieved by the addition of lime to the sludge. Lime was added to the sludge and soil in the lagoon and mixed in place. Approximately 3150 cubic yards of combined sludge and soil were stabilized using 511 tons of lime. The lagoon stabilization was completed July 12, 1988.

Toxicity test results on samples of stabilized lagoon material show that the stabilized sludge meets the remedial objective of minimizing the leachability of the contaminants of concern. All extract results met the toxicity criteria performance standard established in the remedial design.

Unconfined compressive strength of the stabilized material was determined to be less than the design objective of 25 psi. It was reasoned that the low unconfined compressive strength of the material may be due to sheer failure along planes of sandy or organic peat lenses for which this test is not appropriate. In order to ensure adequate support for construction of the clay cap an engineered subgrade was installed which consisted of a geotextile and 12 inches of aggregate. The cap was then installed as designed to meet the requirements in 40 CFR §264.210.

System Operation/Operation and Maintenance/Groundwater Standards Compliance

The first round of baseline groundwater quality samples was collected on July 12, 1988. Samples were analyzed for trichloroethylene, vinyl chloride, 1,1-dichloroethtylene, copper, nickel, zinc, and fluoride. In all rounds of sampling the concentrations for the indicator contaminants remain below the clean-up levels.

In May of 1997, the Wisconsin Department of Natural Resources (WDNR) entered into a Consent Order with Northern Engraving. This Consent Order required Northern Engraving to continue groundwater monitoring using a lower detection limit. This was necessary because previous monitoring was performed using detection limits that exceeded the groundwater standards found in chapter NR 140, Wisconsin Administrative Code. Based on the monitoring results, WDNR determined that no additional monitoring was required at this site. WDNR closed out the Consent Order and the monitoring wells near the Superfund Site areas were abandoned in November, 2000. There is currently no groundwater monitoring at the site associated with the Superfund site.

NEC maintains and inspects annually the cap, sludge lagoon, drainage ditch, the seepage pit, the sludge dump site areas, and fence.

There has been no erosion or settlement of the cap system. The only maintenance required is regular mowing. The areas of concern have maintained a very healthy grass cover during the post remedial period.

V. Progress since the Last Five-Year Review

The 2000 five-year review recommended that:

- The caps to the drain system clean-outs be repaired so that they are again readily accessible and water tight; and

- The mole holes in the cover be stamped back down and seeded as necessary.

The April, 2005 inspection, documented below, found that these recommendations had apparently been carried out and these problems weren't noted.

VI. Five-Year Review Process

Administrative Components

The site Five-Year Review was led by Gary Edelstein of WDNR, with assistance from Gladys Beard of EPA, Remedial Project Manager (RPM) for the NEC site. Susan Pastor of EPA led the community involvement effort.

The review components include:

- Community Involvement;
- Document Review;
- Data Review;
- Site Inspection;
- Local Interviews; and
- Five-Year Review Report Development and Review.

Community Involvement

On February 25, 2005, a notice was published in the local newspaper, the Sparta Herald that a five-year review was to be conducted.

It is planned that around August 30, 2005, a notice will be published the in same local newspaper that announces the completion of the Five-Year Review report for the NEC site. The results of the review and the report are available to the public at the Sparta Free Library and the EPA Region 5 office, as well as in the EPA's web site:
http://www.epa.gov/region5/superfund/fiveyear/fr_index.html

Document Review

This five-year review consisted of a review of relevant documents including O&M records, ROD, Site Close-out Report and the last Five-Year Review.

Site Inspection and Institutional Controls

An inspection was conducted by the State on April 11, 2005 (See Attachment 2, which is the handwritten inspection form, photo key diagram and 16 photographs). The purpose of the inspection was to assess the protectiveness of the remedy, including the presence of fencing to restrict access and the integrity of the cap.

No significant issues have been identified at any time regarding the cap, the drainage structures, or the fence. Examination of the cap revealed that grass was in good condition. The cap and the surrounding area were undisturbed.

The inspection logs were examined (See Attachment 3). It was noted that the fence inspection was not listed as an inspection item and it is recommend that it be added to the log in the future.

The institutional control in place is a deed affidavit that describes the location of the site and references the Consent Order (Attachment 1). This document should help prevent excavation activities, disturbance of the cap, and any other activities or actions that might interfere with the implemented remedy, because it provides some notice that the remedy was conducted. However, it may not be as effective as other institutional controls, such as a deed restriction. Therefore, it is recommended that a more effective control, in the form of a deed restriction, be filed. This instrument outlines what activities, such as cap disturbance and excavation or excavation in the seepage pit area, are prohibited. WDNR has guidance on the preparation of deed restrictions that may be followed in the document "Case Close Out and the requirements for Institutional controls and VPLE Insurance", PUBL-RR-606 (http://dnr.wi.gov/org/aw/rr/archives/pubs/RR606.pdf).

Interviews

Mr. Darrell Zietlow, Water Quality Manager and the person responsible for site O&M was interviewed at the site inspection. He confirmed that the attached deed affidavit was the only

instrument filed for the site and no deed restrictions that specifically prohibit certain unacceptable activities have been filed.

VII. Technical Assessment

Question A: Is the remedy functioning as intended by the decision documents?

The review of documents and the results of the site inspection indicate that the remedy is functioning as intended by the ROD. The stabilization and capping of contaminated soils and sludges have achieved the remedial objectives to minimize the migration of contaminants to groundwater and surface water and prevent direct contact with, or ingestion of, contaminants in soil and sediments. The effective implementation of institutional controls has prevented disturbance of the remedy.

Operation and maintenance of the cap and drainage structures have, on the whole, been effective.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid?

There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy.

Federal MCLs are not stated in the ROD instead alternate concentration limits (ACLs) were applied by WDNR and were approved by U.S. EPA. The WDNR refer to the ACLs established by the WDNR as groundwater cleanup levels for the contaminants of concerns (COCs) at NEC. U.S. EPA and WDNR consider the remedy to be protective of human health and the environment.

Changes in Standards and To Be Considereds

Groundwater, surface water and soil standards have been met by the remedy. There have been no changes in these ARARs and no new standards or TBCs affecting the protectiveness of the remedy.

Changes in Exposure Pathways, Toxicity, and Other Contaminant Characteristics

The exposure assumptions used to develop the Human Health Risk Assessment included both current exposures (older child trespasser, adult trespasser) and potential future exposures (young and older future child resident, future adult resident and future adult worker). There have been no changes in the toxicity factors for the contaminants of concern that were used in the baseline risk assessment. These assumptions are considered to be conservative and reasonable in evaluating risk and developing risk-based cleanup levels. No change to these assumptions or the cleanup levels developed from them is warranted. There has been no change to the standardized risk assessment methodology that could affect the protectiveness of the remedy.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

No ecological targets were identified during the baseline risk assessment and none were identified during the five-year review, and therefore monitoring of ecological targets is not necessary. No weather-related events have affected the protectiveness of the remedy. There is no other information that calls into question the protectiveness of the remedy.

Technical Assessment Summary

According to the data reviewed, the site inspection, and the interviews, the remedy is functioning as intended by the ROD. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. All ARARs cited in the ROD have been met. There has been no changes in the toxicity factors for the contaminants of concern that were used in the baseline risk assessment, and there have been no changes to the standardized risk assessment methodology that could affect the protectiveness of the remedy. There is no other information that calls into question the protectiveness of the remedy.

VIII. Issues and Recommendations and Follow-Up Actions

It was noted that the fence inspection was not listed as an inspection item and it is recommend that it be added to the log in the future.

The current deed affidavit may not be as effective as other institutional controls, such as a deed restriction. Therefore, it is recommended that a more effective control, in the form of a deed restriction, be filed. This instrument outlines what activities, such as cap disturbance, excavation or excavation in the seepage pit area, are prohibited and prohibited the ingestion of groundwater. WDNR has guidance on the preparation of deed restrictions that may be followed in the document "Case Close Out and the requirements for Institutional controls and VPLE Insurance", PUBL-RR-606 (http://dnr.wi.gov/org/aw/rr/archives/pubs/RR606.pdf). WDNR and EPA will work with the PRP to implement this recommendation within six months.

Recommendations and Follow-Up Actions

No	Issue	Recommendations/ Follow-up Actions	Party Responsible	Oversight *Agency*	Milestone Date	Follow-up Actions: Affects Protectiveness (Y/N)	
						Current	*Future*
1.	Institutional Controls	Need to finalize the institutional controls and the plan for long-term monitoring	PRPs	WDNR	1/30/2006	Y	Y
2.	Fence inspection	Add as an inspection item	PRPs	WDNR	Ongoing	N	Y

X. PROTECTIVENESS STATEMENT

The remedy is functioning as intended and is protective of human health and the environment in the short-term. Long-term protectiveness will be achieved once the follow-up actions and recommendations are completed.

IX. Protectiveness Statement

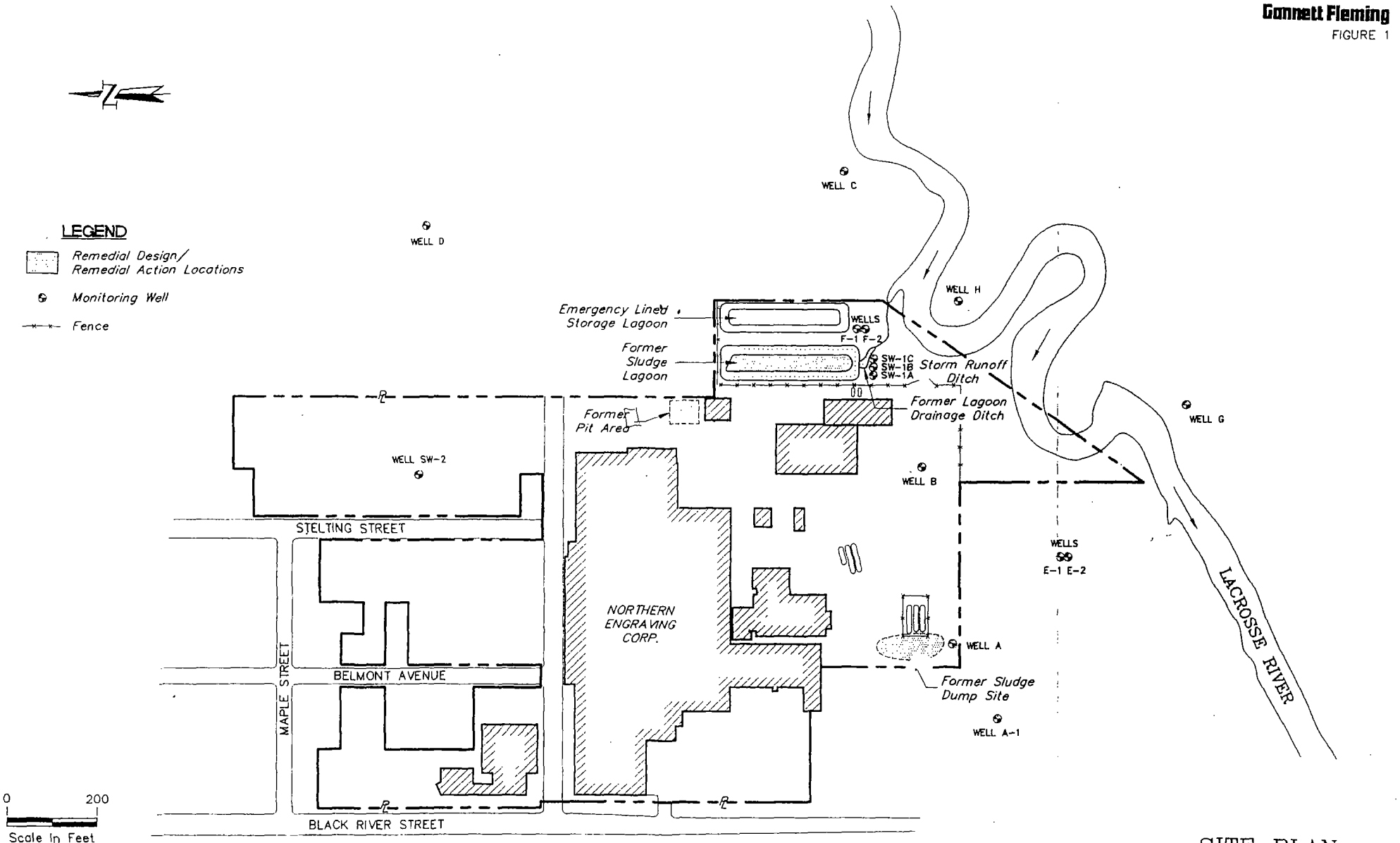
The remedy is protective of human health and the environment. All threats at the site have been addressed through stabilization and capping of contaminated soil and sludges, the installation of fencing and the implementation of institutional controls.

X. Next Review

The next five-year review for the Northern Engraving Corp. Superfund Site is required by August 2010, five years from the date of this review.

Gannett Fleming

FIGURE 1



SITE PLAN

NORTHERN ENGRAVING CORP.

SPARTA, WISCONSIN

060500
37602WA

ATTACHMENT 1

NORTHERN ENGRAVING CORPORATION

803 South Black River Street P.O. Box 377
Sparta, Wisconsin 54656

PHONE: 608-269-6911 FAX: 608-269-9547

July 26, 2000

Ms. Wendy Anderson
Wis. Dept. of Natural Resources
West Central Region Headquarters
1300 W. Clairemont Avenue
Box 4001
Eau Claire, WI 54702-4001

Re: Deed Attachments-Sparta Site

Dear Wendy:

As per our conversation this morning, enclosed with this letter are a copy of the old deed attachment and the new one. The reason for issuing the new one was to update section 3 to reflect the status of the site today.

The Consent Order is also filed as an attachment to the deed. I've included page 15 and 16 of the Consent Order. I highlighted the section (XI.), which I believe addresses your question about maintaining the clay cap. If you have further questions please call me at 608-269-6911.

Sincerely,

Darrell Zietlow
Northern Engraving Corp.
Environmental Management Dept.

Enc.
Cc: Bruce Corning (NEC)
Dennis Birke (DeWitt, Ross & Stevens)

Environmental Management System Registered to ISO 14001:1996 Certification # 67661-E1

AFFIDAVIT

Bruce L. Corning, being duly sworn, deposes and says:

1. Affiant is the Director of Environmental Management of Northern Engraving Corporation.

2. Northern Engraving Corporation is now the owner of two parcels of land located in Outlot 111, Assessor's Subdivision, City of Sparta, Monroe County, Wisconsin, more particularly described as follows:

Parcel 1: Commencing at the Northwest corner of lands as described in Vol. 235 Deeds, Page 390; thence N 89 degrees 41' 24" E along the north line of said lands a distance of 47.70 feet; thence S 0 degrees 21' 10" W a distance of 8.41 feet, being the Point of Beginning; thence N 89 degrees 41' 24" E a distance of 74.78 feet; thence S 0 degrees 21' 10" W a distance of 303.57 feet; thence S 52 degrees 50' 54" W a distance of 24.08 feet; thence N 89 degrees 06' 50" W a distance of 24.90 feet; thence N 72 degrees 10' 27" W a distance of 32.26 feet; thence N 0 degrees 21' 10" E a distance of 307.45 feet to the Point of Beginning. Containing 0.54 acres of land more or less. Subject to all easements and rights-of-way of record.

Return to:
Dennis P. Birke, Esq.
DeWitt Ross & Steven S.C.
2 East Mifflin Street, Suite 600
Madison, WI 53703

Parcel 2: Commencing at the Northwest corner of lands as described in Vol. 235 Deeds, Page 390; thence N 0 degrees 18' 36" W along the extension of the east line of Outlot 118, a distance of 26.64 feet, being the Point of Beginning; thence S 87 degrees 00' 25" W a distance of 66.44 feet; thence N 0 degrees 13' 58" W a distance of 115.28 feet; thence S 88 degrees 17' 10" E a distance of 66.26 feet to the said extension of the east line of Outlot 118; thence S 0 degrees 18' 36" E a distance of 109.83 feet to the Point of Beginning. Containing 0.17 acres of land more or less. Subject to all easements and rights-of-way of record.

3. That the parcels were previously used for wastewater treatment and disposal operations by a metal finishing manufacturing facility. A remedial action plan to address environmental concerns has been implemented at these sites pursuant to the attached Consent Decree. The United States Environmental Protection Agency and the Wisconsin Department of Natural Resources have determined that all appropriate response actions have been implemented and that the remedial action conducted at the site remains protective of public health, welfare and the environment.

4. The purpose of this Affidavit is to make the aforementioned facts a matter of public record.

Dated this 25th day of May 2000.

Bruce L. Corning
Director of Environmental Management

Subscribed to and sworn to before me
this 25th day of May 2000.

Notary Public
My Commission My commission expires April 15, 2001

Instrument Drafted By:
Dennis P. Birke, Esq.
DeWitt Ross & Stevens S.C.

387921

INDEXED

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REGISTER' OFFICE
County of Monroe, Wis
Received for record this 27
day of Aug A.D., 1987
at 8:30 o'clock A. M.
[signature] Register
6.00 pd atty Smyth
P.O. 841560
Lax

AFFIDAVIT

STATE OF WISCONSIN)
) ss. 018
COUNTY OF MONROE)

C. E. Hughes, being duly sworn, deposes and says:

1. Affiant is the Vice President - Administration of Northern Engraving Corporation.

2. Northern Engraving Corporation is now the owner of two parcels of land located in Outlot 111, Assessor's Subdivision, City of Sparta, Monroe County, Wisconsin, more particularly described as follows:

Parcel 1: Commencing at the Northwest corner of lands as described in Vol. 235 Deeds, Page 390; thence N 89 degrees 41' 24" E along the north line of said lands a distance of 47.70 feet; thence S 0 degrees 21' 10" W a distance of 8.41 feet, being the Point of Beginning; thence N 89 degrees 41' 24" E a distance of 74.78 feet; thence S 0 degrees 21' 10" W a distance of 303.57 feet; thence S 52 degrees 50' 54" W a distance of 24.08 feet; thence N 89 degrees 06' 50" W a distance of 24.90 feet; thence N 72 degrees 10' 27" W a distance of 32.26 feet; thence N 0 degrees 21' 10" E a distance of 307.45 feet to the Point of Beginning. Containing 0.54 acres of land more or less. Subject to all easements and rights-of-way of record.

Parcel 2: Commencing at the Northwest corner of lands as described in Vol. 235 Deeds, Page 390; thence N 0 degrees 18' 36" W along the extension of the east line of Outlot 118, a distance of 26.64 feet, being the Point of Beginning; thence S 87 degrees 00' 25" W a distance of 66.44 feet; thence N 0 degrees 13' 58" W a distance of 115.28 feet; thence S 88 degrees 17' 10" E a distance of 66.26 feet to the said extension of the east line of Outlot 118; thence S 0 degrees 18' 36" E a distance of 109.83 feet to the Point of Beginning. Containing 0.17 acres of land more or less. Subject to all easements and rights-of-way of record.

3. That the parcels were previously used for wastewater treatment and disposal operations by a metal finishing manufacturing facility. A remedial action plan to address environmental concerns has been implemented at these sites. The plan has been reviewed by the Wisconsin Department of Natural Resources and a record of decision is pending.

4. The purpose of this Affidavit is to make the aforementioned facts a matter of public record.

387921

RECORDS VOL 83 PAGE 293

Further affiant saith not.

Dated this 24th day of August, 1987.

C. E. Hughes
Vice President - Administration

Subscribed and sworn to
before me this 24th day
of August, 1987.

Notary Public
State of Wisconsin, County of Monroe
My Commission: 1-10-88.

Instrument Drafted By:

Attorney Robert P. Smyth
P.O. Box 1567
La Crosse, WI 54602-1567

equity against any person, firm, partnership or corporation not a signatory to this Consent Order from any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release or disposal of any materials or hazardous substances at, to or from the site. This Consent Order does not constitute any decision on preauthorization of funds under Section 111(a)(2) of CERCLA. The parties to this Consent Order expressly reserve all rights (including any right to contribution possessed by NEC and/or NECO, and/or against any other parties who may be responsible for actual or threatened releases at the site), claims, demands and causes of action they have or may have against any and all other persons and entities who are not parties to this Consent Order. NEC and/or NECO agrees to indemnify and save and hold harmless the U.S. EPA and WDNR from any and all claims or causes of action arising from acts or omissions of NEC and/or NECO in carrying out the activities pursuant to this Consent Order. U.S. EPA and WDNR are not a party in any contract involving NEC or NECO at the NEC site.

The U.S. EPA and WDNR shall not be held liable under or as a party to any contract entered into by NEC in carrying out the activities pursuant to this Consent Order.

XI. Deed Notice, Land Use and Conveyance of Title

NEC agrees not to use any portion of the NEC site in any manner which would adversely affect the integrity of any containment system, or monitoring system installed pursuant to this Consent Order. A copy of this Consent Order shall be recorded in the Register of Deeds office for Monroe County, Wisconsin, with

the deed for the NEC site.

No conveyance of title, easement or other interest in any portion of the NEC site shall be consummated by NEC without provision for continued operation and maintenance of any containment system, and monitoring system installed pursuant to this Consent Order. NEC shall notify U.S. EPA and WDNR by registered mail at least ninety (90) days prior to any conveyance of NEC's intent to convey any interest in land which comprises the NEC site and of the provision made for continued maintenance of the system.

XII. Other Applicable Laws

All actions required to be taken pursuant to this Consent Order shall be undertaken in accordance with the requirements of all applicable local, State and Federal laws and regulations.

XIII. Reimbursement of Cost

Within 10 days of the approval of this Consent Order in accordance with the provisions of Paragraph XIV of this Order the U.S. EPA will provide NEC with an itemized statement of the U.S. EPA expenditures as of the date of such approval. NEC shall Pay into the Hazardous Substance Response Fund the sum demanded by the U.S. EPA as reimbursement of U.S. EPA's expenditures (payment to be forwarded to the U.S. EPA, Region V, Regional Hearing Clerk, 230 South Dearborn, Chicago, Illinois, 60604). The amount demanded by the U.S. EPA shall not exceed $10,000. Payment of this sum shall be in full and complete satisfaction of all past monetary claims of U.S. EPA for expenditures made prior to the execution of this Consent Order.

ATTACHMENT 2

Please note that "O&M" is referred to throughout this checklist. At sites where Long-Term Response Actions are in progress, O&M activities may be referred to as "system operations" since these sites are not considered to be in the O&M phase while being remediated under the Superfund program.

Five-Year Review Site Inspection Checklist (Template)

(Working document for site inspection. Information may be completed by hand and attached to the Five-Year Review report as supporting documentation of site status. "N/A" refers to "not applicable.")

I. SITE INFORMATION	
Site name: Northern Engraving	**Date of inspection:** 4/11/05
Location and Region: Sparta, WI R5	**EPA ID:** WID006183826
Agency, office, or company leading the five-year review: WDNR, G. Edelstein	**Weather/temperature:** Cloudy, 68°F

Remedy Includes: (Check all that apply)

- [X] Landfill cover/containment
- [X] Access controls
- [X] Institutional controls
- [ ] Groundwater pump and treatment
- [ ] Surface water collection and treatment
- [ ] Other _____
- [ ] Monitored natural attenuation
- [ ] Groundwater containment
- [ ] Vertical barrier walls

Attachments: [ ] Inspection team roster attached [X] Site map attached

II. INTERVIEWS (Check all that apply)

1. **O&M site manager** Darrell Zietlow (Name) — Water Qual Mgr (Title) — 4/11/05 (Date)
   Interviewed [X] at site [ ] at office [ ] by phone Phone no. 608-269-6911 ext. 368
   Problems, suggestions; [ ] Report attached _____

2. **O&M staff** _____ (Name) _____ (Title) _____ (Date)
   Interviewed [ ] at site [ ] at office [ ] by phone Phone no. _____
   Problems, suggestions; [ ] Report attached _____

3. **Local regulatory authorities and response agencies** (i.e., State and Tribal offices, emergency response office, police department, office of public health or environmental health, zoning office, recorder of deeds, or other city and county offices, etc.) Fill in all that apply.

Agency _____
Contact _____ _____ _____ _____
Name Title Date Phone no.
Problems; suggestions; G Report attached _____
_____

Agency _____
Contact _____ _____ _____ _____
Name Title Date Phone no.
Problems; suggestions; G Report attached _____
_____

Agency _____
Contact _____ _____ _____ _____
Name Title Date Phone no.
Problems; suggestions; G Report attached _____
_____

Agency _____
Contact _____ _____ _____ _____
Name Title Date Phone no.
Problems; suggestions; G Report attached _____
_____

4. **Other interviews** (optional) G Report attached.

III. ON-SITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)

1. **O&M Documents**
   - [X] O&M manual — [X] Readily available — [X] Up to date — [ ] N/A
   - [ ] As-built drawings — [ ] Readily available — [ ] Up to date — [ ] N/A
   - [X] Maintenance logs — [X] Readily available — [X] Up to date — [ ] N/A

   Remarks: Inspection log attached. Recommend fence condition be included in the future

2. **Site-Specific Health and Safety Plan** — [ ] Readily available — [ ] Up to date — [X] N/A
   - [ ] Contingency plan/emergency response plan — [ ] Readily available — [ ] Up to date — [X] N/A

   Remarks:

3. **O&M and OSHA Training Records** — [ ] Readily available — [ ] Up to date — [X] N/A

   Remarks:

4. **Permits and Service Agreements**
   - [ ] Air discharge permit — [ ] Readily available — [ ] Up to date — [X] N/A
   - [ ] Effluent discharge — [ ] Readily available — [ ] Up to date — [X] N/A
   - [ ] Waste disposal, POTW — [ ] Readily available — [ ] Up to date — [X] N/A
   - [ ] Other permits _____ — [ ] Readily available — [ ] Up to date — [X] N/A

   Remarks:

5. **Gas Generation Records** — [ ] Readily available — [ ] Up to date — [X] N/A

   Remarks:

6. **Settlement Monument Records** — [ ] Readily available — [ ] Up to date — [X] N/A

   Remarks:

7. **Groundwater Monitoring Records** — [ ] Readily available — [ ] Up to date — [X] N/A

   Remarks: Site ceased groundwater monitoring in 2000

8. **Leachate Extraction Records** — [ ] Readily available — [ ] Up to date — [X] N/A

   Remarks:

9. **Discharge Compliance Records**
   - [ ] Air — [ ] Readily available — [ ] Up to date — [X] N/A
   - [ ] Water (effluent) — [ ] Readily available — [ ] Up to date — [X] N/A

   Remarks:

10. **Daily Access/Security Logs** — [ ] Readily available — [ ] Up to date — [X] N/A

    Remarks:

IV. O&M COSTS

1. **O&M Organization**

G State in-house — G Contractor for State
X PRP in-house — G Contractor for PRP
G Federal Facility in-house — G Contractor for Federal Facility
G Other_____

2. **O&M Cost Records**

G Readily available G Up to date N/A
G Funding mechanism/agreement in place
Original O&M cost estimate_____ G Breakdown attached

Total annual cost by year for review period if available

From_____ To_____ _____ G Breakdown attached
Date Date Total cost
From_____ To_____ _____ G Breakdown attached
Date Date Total cost
From_____ To_____ _____ G Breakdown attached
Date Date Total cost
From_____ To_____ _____ G Breakdown attached
Date Date Total cost
From_____ To_____ _____ G Breakdown attached
Date Date Total cost

3. **Unanticipated or Unusually High O&M Costs During Review Period**

Describe costs and reasons: _____

V. ACCESS AND INSTITUTIONAL CONTROLS X Applicable G N/A

A. Fencing

1. **Fencing damaged** X Location shown on site map G Gates secured G N/A
Remarks Fencing wal undamaged

B. Other Access Restrictions

1. **Signs and other security measures** G Location shown on site map X N/A
Remarks_____

C. Institutional Controls (ICs)

1. **Implementation and enforcement**

Site conditions imply ICs not properly implemented — G Yes ☒ No G N/A
Site conditions imply ICs not being fully enforced — G Yes ☒ No G N/A

Type of monitoring (*e.g.*, self-reporting, drive by) On-site inspections
Frequency Yearly - Insp log attached
Responsible party/agency Northern Engraving
Contact D. Zeitlow

Name	Title	Date	Phone no.

Reporting is up-to-date — G Yes G No ☒ N/A
Reports are verified by the lead agency — G Yes G No ☒ N/A

Specific requirements in deed or decision documents have been met — ☒ Yes G No G N/A
Violations have been reported — G Yes G No ☒ N/A
Other problems or suggestions: ☒ Report attached
Copy of Deed Affidafit attached

2. **Adequacy** ☒ ICs are adequate G ICs are inadequate G N/A
Remarks Deed Affidafit shows provide adequate notice of site conditions to future property owners

D. General

1. **Vandalism/trespassing** G Location shown on site map ☒ No vandalism evident
Remarks

2. **Land use changes on site** ☒ N/A
Remarks

3. **Land use changes off site** ☒ N/A
Remarks

VI. GENERAL SITE CONDITIONS

A. Roads G Applicable G N/A

1. **Roads damaged** G Location shown on site map ☒ Roads adequate G N/A
Remarks

B. Other Site Conditions

Remarks_____

_____

_____

_____

_____

_____

VII. LANDFILL COVERS ☒ Applicable ☐ N/A

A. Landfill Surface Solidified material landfill has composite cover

1. **Settlement** (Low spots) ☐ Location shown on site map ☒ Settlement not evident
   Areal extent_____ Depth_____
   Remarks_____
   _____

2. **Cracks** ☐ Location shown on site map ☒ Cracking not evident
   Lengths_____ Widths_____ Depths_____
   Remarks_____
   _____

3. **Erosion** ☐ Location shown on site map ☒ Erosion not evident
   Areal extent_____ Depth_____
   Remarks_____
   _____

4. **Holes** ☐ Location shown on site map ☒ Holes not evident
   Areal extent_____ Depth_____
   Remarks_____
   _____

5. **Vegetative Cover** ☒ Grass ☒ Cover properly established ☒ No signs of stress
   ☐ Trees/Shrubs (indicate size and locations on a diagram)
   Remarks_____
   _____

6. **Alternative Cover (armored rock, concrete, etc.)** ☒ N/A
   Remarks_____
   _____

7. **Bulges** ☐ Location shown on site map ☒ Bulges not evident
   Areal extent_____ Height_____
   Remarks_____
   _____

8. **Wet Areas/Water Damage** ☒ Wet areas/water damage not evident
   - G Wet areas — G Location shown on site map — Areal extent_____
   - G Ponding — G Location shown on site map — Areal extent_____
   - G Seeps — G Location shown on site map — Areal extent_____
   - G Soft subgrade — G Location shown on site map — Areal extent_____

   Remarks_____

9. **Slope Instability** G Slides G Location shown on site map ☒ No evidence of slope instability
   Areal extent_____
   Remarks_____

B. Benches G Applicable ☒ N/A
(Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)

1. **Flows Bypass Bench** G Location shown on site map G N/A or okay
   Remarks_____

2. **Bench Breached** G Location shown on site map G N/A or okay
   Remarks_____

3. **Bench Overtopped** G Location shown on site map G N/A or okay
   Remarks_____

C. Letdown Channels G Applicable ☒ N/A
(Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)

1. **Settlement** G Location shown on site map G No evidence of settlement
   Areal extent_____ Depth_____
   Remarks_____

2. **Material Degradation** G Location shown on site map G No evidence of degradation
   Material type_____ Areal extent_____
   Remarks_____

3. **Erosion** G Location shown on site map G No evidence of erosion
   Areal extent_____ Depth_____
   Remarks_____

4. **Undercutting** G Location shown on site map G No evidence of undercutting
Areal extent_____ Depth_____
Remarks_____

5. **Obstructions** Type_____ G No obstructions
G Location shown on site map Areal extent_____
Size_____
Remarks_____

6. **Excessive Vegetative Growth** Type_____
☒ No evidence of excessive growth
G Vegetation in channels does not obstruct flow
G Location shown on site map Areal extent_____
Remarks_____

D. Cover Penetrations ☒ Applicable G N/A Cover drainage clean outs in good cond.

1. **Gas Vents** G Active G Passive
G Properly secured/lockedG Functioning G Routinely sampled G Good condition
G Evidence of leakage at penetration G Needs Maintenance
☒ N/A
Remarks_____

2. **Gas Monitoring Probes**
G Properly secured/lockedG Functioning G Routinely sampled G Good condition
G Evidence of leakage at penetration G Needs Maintenance ☒ N/A
Remarks_____

3. **Monitoring Wells** (within surface area of landfill)
G Properly secured/lockedG Functioning G Routinely sampled G Good condition
G Evidence of leakage at penetration G Needs Maintenance ☒ N/A
Remarks_____

4. **Leachate Extraction Wells**
G Properly secured/lockedG Functioning G Routinely sampled G Good condition
G Evidence of leakage at penetration G Needs Maintenance ☒ N/A
Remarks_____

5. **Settlement Monuments** G Located G Routinely surveyed ☒ N/A
Remarks_____

E. Gas Collection and Treatment G Applicable ☒ N/A

1. **Gas Treatment Facilities**
   G Flaring G Thermal destruction G Collection for reuse
   G Good condition G Needs Maintenance
   Remarks_____

2. **Gas Collection Wells, Manifolds and Piping**
   G Good condition G Needs Maintenance
   Remarks_____

3. **Gas Monitoring Facilities** (*e.g.*, gas monitoring of adjacent homes or buildings)
   G Good condition G Needs Maintenance G N/A
   Remarks_____

F. Cover Drainage Layer ☒ Applicable G N/A

1. **Outlet Pipes Inspected** ☒ Functioning G N/A
   Remarks Tested in spring with water to see if flowing correctly

2. **Outlet Rock Inspected** G Functioning ☒ N/A
   Remarks_____

G. Detention/Sedimentation Ponds G Applicable ☒ N/A

1. **Siltation** Areal extent_____ Depth_____ G N/A
   G Siltation not evident
   Remarks_____

2. **Erosion** Areal extent_____ Depth_____
   G *Erosion not evident*
   Remarks_____

3. **Outlet Works** G Functioning G N/A
   Remarks_____

4. **Dam** G Functioning G N/A
   Remarks_____

H. Retaining Walls G Applicable ☒ N/A

1. **Deformations** G Location shown on site map G Deformation not evident
   Horizontal displacement_____ Vertical displacement_____
   Rotational displacement_____
   Remarks_____

2. **Degradation** G Location shown on site map G Degradation not evident
   Remarks_____

I. Perimeter Ditches/Off-Site Discharge G Applicable ☒ N/A

1. **Siltation** G Location shown on site map G Siltation not evident
   Areal extent_____ Depth_____
   Remarks_____

2. **Vegetative Growth** G Location shown on site map G N/A
   G Vegetation does not impede flow
   Areal extent_____ Type_____
   Remarks_____

3. **Erosion** G Location shown on site map G Erosion not evident
   Areal extent_____ Depth_____
   Remarks_____

4. **Discharge Structure** G Functioning G N/A
   Remarks_____

VIII. VERTICAL BARRIER WALLS G Applicable ☒ N/A

1. **Settlement** G Location shown on site map G Settlement not evident
   Areal extent_____ Depth_____
   Remarks_____

2. **Performance Monitoring** Type of monitoring_____
   G Performance not monitored
   Frequency_____ G Evidence of breaching
   Head differential_____
   Remarks_____

IX. GROUNDWATER/SURFACE WATER REMEDIES G Applicable ☒ N/A

A. Groundwater Extraction Wells, Pumps, and Pipelines G Applicable G N/A

1. **Pumps, Wellhead Plumbing, and Electrical**
   G Good condition G All required wells properly operating G Needs Maintenance G N/A
   Remarks_____

2. **Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances**
   G Good condition G Needs Maintenance
   Remarks_____

3. **Spare Parts and Equipment**
   G Readily available G Good condition G Requires upgrade G Needs to be provided
   Remarks_____

B. Surface Water Collection Structures, Pumps, and Pipelines G Applicable ☒ N/A

1. **Collection Structures, Pumps, and Electrical**
   G Good condition G Needs Maintenance
   Remarks_____

2. **Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances**
   G Good condition G Needs Maintenance
   Remarks_____

3. **Spare Parts and Equipment**
   G Readily available G Good condition G Requires upgrade G Needs to be provided
   Remarks_____

C. Treatment System G Applicable ☒ N/A

1. **Treatment Train** (Check components that apply)
   G Metals removal G Oil/water separation G Bioremediation
   G Air stripping G Carbon adsorbers
   G Filters_____
   G Additive (*e.g.*, chelation agent, flocculent)_____
   G Others_____
   G Good condition G Needs Maintenance
   G Sampling ports properly marked and functional
   G Sampling/maintenance log displayed and up to date
   G Equipment properly identified
   G Quantity of groundwater treated annually_____
   G Quantity of surface water treated annually_____
   Remarks_____

2. **Electrical Enclosures and Panels** (properly rated and functional)
   G N/A G Good condition G Needs Maintenance
   Remarks_____

3. **Tanks, Vaults, Storage Vessels**
   G N/A G Good condition G Proper secondary containment G Needs Maintenance
   Remarks_____

4. **Discharge Structure and Appurtenances**
   G N/A G Good condition G Needs Maintenance
   Remarks_____

5. **Treatment Building(s)**
   G N/A G Good condition (esp. roof and doorways) G Needs repair
   G Chemicals and equipment properly stored
   Remarks_____

6. **Monitoring Wells** (pump and treatment remedy)
   G Properly secured/lockedG Functioning G Routinely sampled G Good condition
   G All required wells located G Needs Maintenance G N/A
   Remarks_____

D. Monitoring Data N/A

1. Monitoring Data
   G Is routinely submitted on time G Is of acceptable quality

2. Monitoring data suggests:
   G Groundwater plume is effectively contained G Contaminant concentrations are declining

D. Monitored Natural Attenuation N/A

1. **Monitoring Wells** (natural attenuation remedy)
G Properly secured/lockedG Functioning G Routinely sampled G Good condition
G All required wells located G Needs Maintenance G N/A
Remarks

X. OTHER REMEDIES

If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.

XI. OVERALL OBSERVATIONS

A. Implementation of the Remedy

Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).

Cover over consolidated wastes area appears to be in good condition and cover drainage system functional. Fencing in good condition, access controls adequate. Photographs taken on day of inspection attached.

B. Adequacy of O&M

Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.

Inspection logs adequate. Cover appears to be properly maintained. Fence maintenance should be added to inspection logs

C. Early Indicators of Potential Remedy Problems

Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future.

D. Opportunities for Optimization

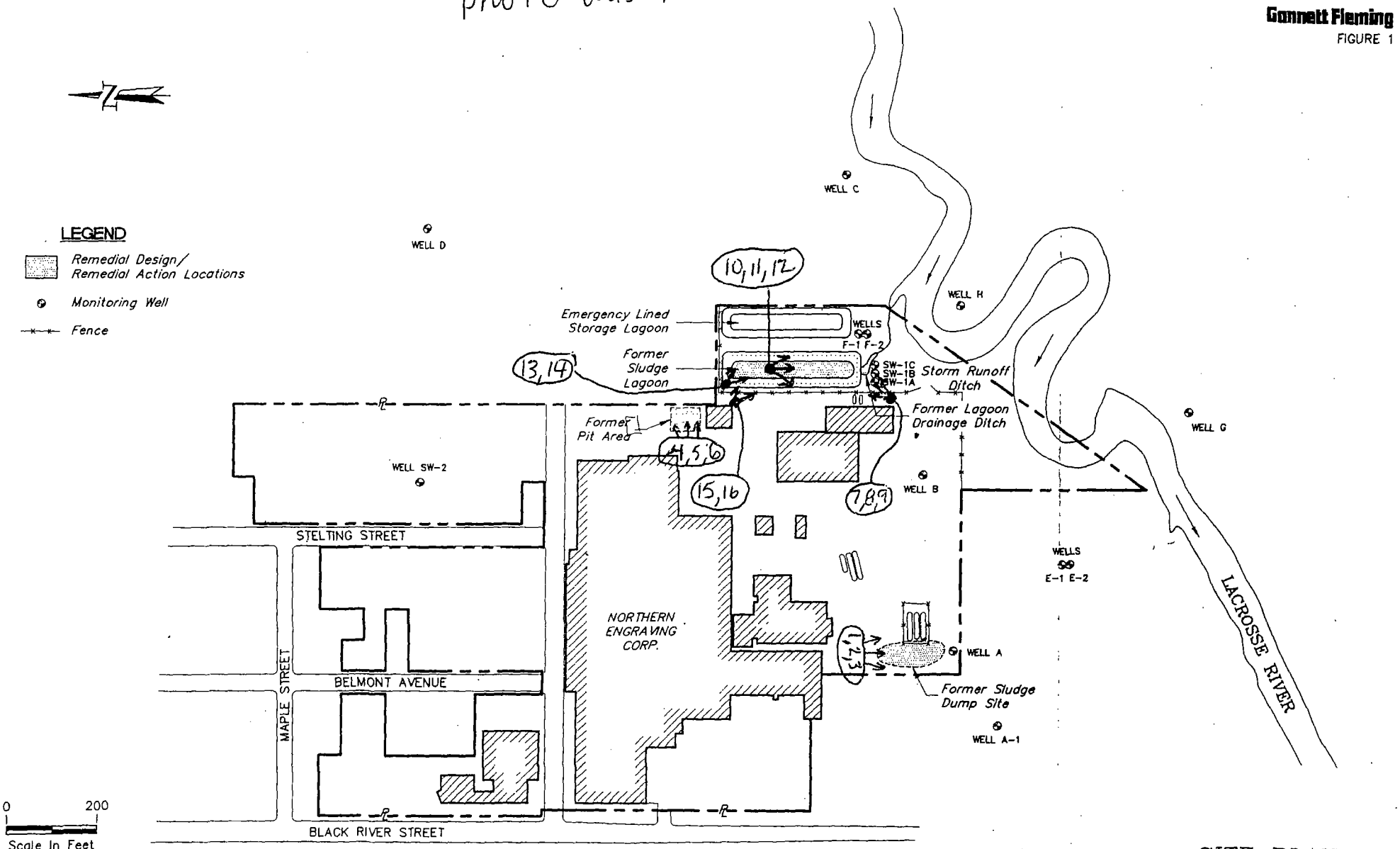
Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.

Fence inspection & maintenance activities should be added to the maintenance logs.

Note: Slide location map and 16 slide photos taken at the inspection are part of this form.

4/11/05
SITE INSPECTION
PHOTO KEY
Arrows show direction
photo was taken

Gannett Fleming
FIGURE 1



SITE PLAN
NORTHERN ENGRAVING CORP.

060500
37602WA

ATTACHMENT 3

Superfund Site, Record of Inspections

Date of Inspection	Sludge Lagoon	Drainage Ditch	Seepage Pit	Sludge Dumpsite	
4/10/01	Cap in good condition, drainage system working	grass cover in good condition	grass cover in good condition	grass cover in good condition	
7/20/01	remaining wells were abandoned, except for SW1A which is used for another remediation project				
3/22/02	grass cover in good condition; drainage system working	grass cover in good cond.	grass cover in good condition	grass cover in good condition	
4/21/03	Cover good, drainage system working after heavy rain	grass cover in good cond.	grass cover in good condition	grass cover in good condition	
3/29/04	grass cover good, drainage sys. working after rain	grass cover in good condition	grass cover in good condition	grass cover in good condition	
4/7/05	grass cover in good condition; drainage system tested with hose, OK	grass cover good	grass cover good	grass cover good